THE LAW OFFICE OF MICHAEL J. D'ANIELLO BY: JANINE D. MARTIN, ESQUIRE (307224) 509 SWEDE STREET NORRISTOWN, PENNSYLVANIA 19401 (610) 270-8800

ATTORNEYS FOR DEFENDANT

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ANDREW R. PERRONG, :

.

Plaintiff

:

v.

: No. 2:22-CV-04475-MSG

MONTGOMERY COUNTY DEMOCRATIC

COMMITTEE,

.

MONTCO VICTORY,

:

JOSEPH FOSTER

:

Defendants

and

DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT

Defendant Montgomery County Democratic Committee, by and through their undersigned counsel and pursuant to Federal Rule of Civil Procedure 12(b), hereby respectfully moves this Honorable Court for an order dismissing Plaintiff's Amended Complaint with prejudice for the reasons explained in the accompanying Brief.

Dated: January 24, 2023 Respectfully submitted,

THE LAW OFFICE OF MICHAEL J. D'ANIELLO

By: /s/ Janine D'Aniello Martin janine@daniellolaw.com

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Fax: 610-270-0503 Attorneys for Defendant